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January 11, 2024

**BY ECF**

Honorable Ann M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Galloway v. Cty. of Nassau, et al.*, 19 CV 5026 (AMD) (JMW)

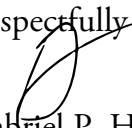
Your Honor:

I represent plaintiff in the above-referenced action. I write to respectfully advise the Court of a recent discovery by our firm which, in the interests of full transparency, we believe should be disclosed to the Court and to the parties.

The Firm has recently learned that an attorney hired in November 2023 had worked for Bee Ready, the law firm previously representing the Village of Hempstead defendants in this action. That new attorney, Michael Siravo, was not formally screened until today; however, he has never worked on this matter or any civil rights cases in our firm; he has never communicated with me or any attorney in the firm's civil rights practice group on any matter; and by the time he was hired by my firm, the pending summary judgment motions were fully briefed in this case. There has been no activity in this matter by my firm since then; and Mr. Siravo has been assigned to and has only worked on single-event personal injury matters at our firm as part the firm's separate trial team. Moreover, we have confirmed that Mr. Siravo never accessed any electronic files or written documents concerning this matter, nor did I or any member of the civil rights practice group discuss any aspect of this matter with Mr. Siravo. Indeed, Mr. Siravo advised the firm's General Counsel in an interview in connection with the preparation of this letter that he has no recollection of the *Galloway* matter or of any work he may have performed prior to leaving the Bee Ready firm in 2020 when he left to serve as a managing attorney for a large Long Island-based plaintiff's firm.

My firm stands ready to submit sworn declarations to confirm the facts set forth above.

Respectfully submitted,

  
Gabriel P. Harvis

cc: All Counsel